

# EDWARDS ANGELL PALMER & DODGE LLP

750 Lexington Avenue New York, NY 10022 212.308.4411 fax 212.308.4844 eapdlaw.com

Jason R. Bogni

212.912.2907

jbogni@eapdlaw.com

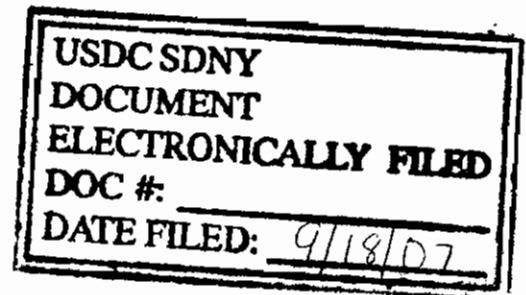
September 7, 2007

## VIA FIRST CLASS MAIL

Hon. Miriam Goldman Cedarbaum  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Beth Israel Medical Center v. Local 1199 SEIU  
Case No. 07 Civ. 6254 (MGC) (KNF)

# MEMO ENDORSED



Dear Judge Cedarbaum:

This firm represents Plaintiff Beth Israel Medical Center (the "Hospital") in the above-referenced case, in which Defendant filed a "Motion For Judgment Confirming Arbitration Award And Dismissing Employer's Petition To Vacate Award" on August 30, 2007. I write on behalf of the parties to request that the return date for the motion be adjourned by three weeks to October 18, 2007 at 9:30 a.m.<sup>1</sup>, that the date for the Hospital to respond to Defendant's motion be extended by two weeks to October 3, 2007, and that the date for Defendant to submit reply papers be extended to October 16, 2007 (giving Defendant one additional week to prepare its papers). This is the first joint request for an extension of time to complete motion papers, to which Defendant's counsel, Barry Peek, gave his consent.

This request is made because the importance of the papers, upon which the outcome of this case will likely be decided, requires significant time for preparation and for a meaningful review by the Hospital. Defendant also requires additional time for preparation of its reply papers. Accordingly, it is respectfully requested that the motion return date be adjourned and the time for the parties to submit their papers be extended as set forth above.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Jason Bogni".

Jason R. Bogni

cc: Barry J. Peek, Esq., Attorney for Defendant  
(By first class mail)

*Request granted,  
So ordered,*

*S/*

*United States District Judge  
September 17, 2007*

<sup>1</sup> The Court has scheduled a Case Management and Scheduling Conference for this case for the same day, October 18, 2007, at 10:30 a.m.